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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**DECLARATION OF LESLEY E.
WEAVER IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

I, Lesley E. Weaver, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am the Partner-in-Charge of the California Office of Bleichmar Fonti & Auld LLP (“BFA”), Co-Lead Counsel for Plaintiffs in In re Facebook, Inc. Consumer Privacy User Profile Litigation, Case No. 18-md-02843-VC-JSC (the “MDL”), and a member in good standing of the bar of the State of California and of this Court.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. In accordance with Civil Local Rules 79-5(d)(1)(A) and (e), this declaration is made in support of Plaintiffs’ Administrative Motion to File Under Seal:

	Document	Portions Sought to be Sealed
1	Plaintiffs’ Response in Reply to Defendant Facebook, Inc.’s Request to Enforce the Partial Stay of Discovery in Pretrial Order No. 20 and In Support of Cross-Motion to Compel	Limited Portions of paragraphs in Section I at 1-2; Section II.A at 4; Section II.B at 6-7, 8, 9.
2	Exhibit F	The 2 pages comprising Exhibit F, Bates Numbered FB-CA-MDL-00203262- FB-CA-MDL-00203263 to Plaintiffs’ Opposition designated by Facebook, Inc. (“Facebook”) as “Highly Confidential – Attorneys Eyes Only” pursuant to the Protective Order.
3	Exhibit G	The 14 pages comprising Exhibit G, Bates Numbered FB-CA-MDL-01119012- FB-CA-MDL-01119025 to Plaintiffs’ Opposition designated by Facebook, Inc. (“Facebook”) as “Highly Confidential – Attorneys Eyes Only” pursuant to the Protective Order.

4. Attached hereto as **Exhibit 1** is a redacted version of Plaintiffs’ Response in Reply to Defendant Facebook, Inc.’s Request to Enforce The Partial Stay of Discovery in Pretrial Order No. 20 and In Support of Cross-Motion to Compel.

5. Attached hereto as **Exhibit 2** is an unredacted version of Plaintiffs' Response in Reply to Defendant Facebook, Inc.'s Request to Enforce The Partial Stay of Discovery in Pretrial Order No. 20 and In Support of Cross-Motion to Compel.

6. Attached hereto as **Exhibit 3** is Exhibit F to Plaintiffs' Response in unredacted form. Pursuant to Civil Local Rule 79-5(d)(1)(C), a redacted version of Plaintiffs' Submission is not required as the Plaintiffs' seek to file the entirety of this document under seal.

7. Attached hereto as **Exhibit 4** is Exhibit G to Plaintiffs' Response in unredacted form. Pursuant to Civil Local Rule 79-5(d)(1)(C), a redacted version of Plaintiffs' Submission is not required as the Plaintiffs' seek to file the entirety of this document under seal.

8. The above-listed documents contain or summarize content that Defendant Facebook has designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order entered in this Action, Dkt. No. 122.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 19th day of October, 2020 in Oakland, California.

/s/ Lesley E. Weaver
Lesley E. Weaver

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2020, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all counsel of record registered in the CM/ECF system. In accordance with Civil L.R. 5-1(h) and Civil L.R. 79-5(e), I also caused a copy of the under seal documents to be served via email on counsel of record for all parties. An electronic copy of the public redacted filings was also provided via email to the parties noted below:

Anjeza Hassan
annie.sara@yahoo.com

/s/ Lesley E. Weaver
Lesley E. Weaver